

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

Daedalus Blue LLC

Plaintiff,

v.

SZ DJI Technology Co., Ltd., &
DJI Europe B.V.

Defendants.

Civil Action No. 6:20-cv-00073

The Honorable Alan D. Albright

JOINT PROPOSED SCHEDULING ORDER

Deadline	Item
July 10, 2020	Deadline for Motions to Transfer
August 28, 2020	Defendant serves preliminary invalidity contentions in the form of (1) a chart setting forth where in the prior art references each element of the asserted claim(s) are found, (2) an identification of any limitations the Defendant contends are indefinite or lack written description under section 112, and (3) an identification of any claims the Defendant contends are directed to ineligible subject matter under section 101. Defendant shall also produce (1) all prior art referenced in the invalidity contentions, (2) technical documents, including software where applicable, sufficient to show the operation of the accused product(s), and (3) summary, annual sales information for the accused product(s) for the prior two years, unless the parties agree to some other timeframe.
September 11, 2020	Parties exchange claim terms for construction.
September 25, 2020	Parties exchange proposed claim constructions.
October 2, 2020	Parties disclose extrinsic evidence. The parties shall disclose any extrinsic evidence, including the identity of any expert witness they may rely upon with respect to claim construction or indefiniteness. With respect to any expert identified, the parties shall also provide a summary of the witness's expected testimony including the opinions to be expressed and a general description of

	the basis and reasons therefore. A failure to summarize the potential expert testimony in a good faith, informative fashion may result in the exclusion of the proffered testimony. With respect to items of extrinsic evidence, the parties shall identify each such item by production number or produce a copy of any such item if not previously produced.
October 9, 2020	Deadline to meet and confer to narrow terms in dispute and exchange revised list of terms/constructions.
October 23, 2020	Parties file Opening claim construction briefs up to 30 pages in length , including any arguments that any claim terms are indefinite.
November 13, 2020	Parties file Responsive claim construction briefs up to 30 pages in length.
December 2, 2020	Parties file Reply claim construction briefs up to 15 pages in length.
December 7, 2020	Parties submit Joint Claim Construction Statement. In addition to filing, the parties shall jointly submit, via USB drive, cloud-storage, or email to the law clerk pdf versions of all as-filed briefing and exhibits. Absent agreement of the parties, the Plaintiff shall be responsible for the timely submission of this and other Joint filings.
January 4, 2021	Parties submit to the Court tutorial presentations; the Court to decide if it would prefer the tutorial presentation to be live
January 7, 2021 at 9 a.m.	Markman Hearing

SIGNED this 11th day of July, 2020.



Alan D Albright
United States District Judge